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May 18, 1993   MAY 2 4 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street N.W. - Room 222
Washington, DC 20554

Re: PR DOCKET NO. 92-235

Dear Ms. Searcy:

We have the following comment regarding the revision of the **Private Land Mobile Radio (PLMR) Services** and the modification of the policies governing those services (PR Docket No. 92-235, the replacement of Part 90 by PART 88).

1. **WE DISAGREE WITH PR DOCKET 92-235 AS IT IS CURRENTLY PROPOSED.**

2. The fire, law enforcement and ambulance agencies of Contra Costa County service a population of over 850,000. **The equipment costs alone to meet the proposed requirements of PR docket 92-235 are estimated at over FOURTEEN (14) MILLION DOLLARS.** This estimate is based on the 108 base stations and 1,737 mobile and portable radios in the county's largest police, fire and public works affected agencies. **County and city governments** are experiencing severe budget cutbacks, including layoffs, and simply **will not be able to meet the mandate as proposed.**

3. In effect, PR Docket 92-235 is a locally mandated program; therefore, we believe that **the federal government should provide a changeover funding source,** such as seed funding through block grants for local government agencies.

4. **The current licensee should remain the licensee** for the narrowband channels which will be split out of the sideband channel, **up to the year 2005,** which will be ten years from adoption of the FCC regulations. This will give local government the time required to make such a tremendous changeover in equipment which the new narrowband channels will require.

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5. We disagree that the frequency coordinating agencies would manage their proposed major